

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JORDAN JAFFE IN
SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF
EXHIBIT A TO WAYMO'S DISCOVERY
LETTER BRIEF RE: INSPECTION OF
LiDAR DEVICES**

1 I, Jordan Jaffe, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am a partner at the law firm Quinn Emanuel Urquhart & Sullivan, LLP,
4 counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set forth
5 in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal Portions of Exhibit A to Waymo’s Discovery Letter Brief Re: Inspection of LiDAR Devices (the
8 “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials:

Document	Portions to Be Filed Under Seal
Exhibit A to Waymo’s Discovery Letter Brief	Highlighted Portion

11
12 3. Exhibit A contains a reference to Waymo’s trade secret information, which Waymo
13 seeks to seal. This Exhibits’ reference of Waymo’s asserted trade secrets includes an identification of
14 Waymo’s technology related to the confidential design and functionality of Waymo’s proprietary
15 autonomous vehicle system, which Waymo maintains as secret. I understand that these trade secrets
16 are maintained as secret by Waymo (Dkt. 24-15) and are valuable as trade secrets to Waymo’s
17 business (Dkt. 24-3). The public disclosure of this information would give Waymo’s competitors
18 access to descriptions of the functionality of Waymo’s autonomous vehicle system. If such
19 information were made public, I understand that Waymo’s competitive standing would be
20 significantly harmed.

21 4. I understand that Waymo maintains that this information as secret. The public
22 disclosure of this information would cause significant competitive harm to Waymo, as its trade secrets
23 would become known to competitors who could use such information to Waymo’s disadvantage.

24 5. Waymo’s request to seal is narrowly tailored to those portions of Exhibit A that merit
25 sealing.
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1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct, and that this declaration was executed in San Francisco, California, on April 10,
3 2017.

4 By /s/ Jordan Jaffe

5 Jordan Jaffe

6 Attorneys for WAYMO LLC
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